

REMARKS

Reconsideration of the application is requested in view of the amendment to the claims and the remarks presented herein.

The claims in the application are claims 89 to 105, all other claims having been cancelled. Applicant reserves the right to file a divisional application on non-elected claims 1 to 20.

Applicants requests that the substituted specification and drawings be replaced with the original specification and drawings and that the claims be replaced with claims 89 to 105 which are believed to be supported in the original application and drawings to obviate the objection to the drawings and the rejections of 35 USC 112 1<sup>st</sup> and 2<sup>nd</sup> paragraphs.

Claims 20 to 53, 87 and 88 were rejected under 35 USC 102 as being anticipated by Nuovo et al patent which the Examiner states teaches a key-surround module input device comprising a middle key (72) having an input means for inputting data to the computer wherein the middle key is not a mouse button and a key-surround key surrounding a middle key is a stationary, washer-shaped, circular data entry key and that Nuovo teaches the key surround key is pivotable in a plurality of positions and one of the plurality of actuating contact points out puts data to a computer.

Applicant respectfully traverses this ground of rejection since Nuovo relates to a navigation key (72) at the center of a telephone key pad while Applicant's invention relates to a middle key that is a non-directional keyboard key. The navigational key of Nuovo is a directional key and therefore does not anticipate Applicant's invention. Nuovo also teaches a telephone key pad (56) that is rotated (lines 33-43 of column 2) and does not teach a pivotable key-surround key as Applicant claims.

Nuovo further describes a telephone pressure-sensitive part (82) located beneath it connected by an axle as shown Figs. 2 and 3 and lines 41 to 58 of columns 4 and Applicant does not have such a construction. Nuovo also teaches a centrally located telephone key pad with a navigation key (72) while Applicant has a middle key that is a non-directional Qwerty keyboard key and does not relate to a centrally located navigated or directional key. Therefore, Nuovo does not anticipate or render obvious Applicant's invention and withdrawal of this ground of rejection is requested.

Claims 20 to 26, 28 to 45, 47 to 53, 68 to 76, 87 and 88 are rejected under 35 USC 102 as being anticipated by the Habu published patent application which the Examiner states teaches a key-surround module input device comprising a touch-sensitive display, a middle key with an input means for inputting data to a computer wherein the middle key is not a mouse button and a key-surround key surrounding a middle-key which is stationary, washer-shaped, circular data entry keys. The Examiner further states Habu shows the key-surround key is pivotable in a plurality of positions and actuation of one of the plurality of actuating contact points outputs a data to a computer.

Applicant traverses this ground of rejection since the Habu reference does not anticipate or render obvious Applicant's invention. Habu describes a four panel pin number entry device with a center button (18) surrounded by donuts that rotate while Applicant claims a keyboard having a middle key that is a non-directional Qwerty keyboard key surrounded by a stationary key-surrounded key. Habu's four panel pin number entry device has numeral entry keys that are rotatable for concealing finger movement by a key-surround key that is pivotable which rotatable key-surround key is lacking in Applicant's invention. Habu also discloses in paragraph 34 protuberances 44 and 45 which are lacking in Applicant's invention.

Applicant claims a Qwerty keyboard middle key with a first, second and third stationary keys that are pivotable and does not disclose a circular base and rotates. Therefor, Habu does not anticipate or render obvious Applicant's invention. Moreover, it should be noted that Habu was published on July 18, 2002 while the present application was filed on April 16, 2001 and is not a proper reference for this application. Therefore, withdrawal of this ground of rejection is requested.

Claims 68 to 76 were recited under 35 USC 103 as being obvious over Nuovo taken in view of the of the Dreher and Shimauchi patents or taken in view of Habu. The Examiner concedes Nuovo does not teach a display on a key and a touch sensor above the display. Dreher is cited to show an input device comprising an LCD display mounted on a key and deems one skilled in the art place an indication on a key. The Shimauchi is cited to show a touch sensor above a display so it would be obvious to replace a

mechanical switch on a key with an electronic switch. Habu is cited to teach an input device with a touch sensitive display.

Applicant respectfully traverses these grounds of rejection since the Nuovo and Habu patents fail to teach Applicant's invention for the reasons discussed above and the combination with Dreher and Shimauchi does not obviate the distinctions discussed above. Therefore, withdrawal of these grounds of rejection is requested.

In view of the amendments to the claims and the above remarks, it is believed that the claims point out Applicant's patentable invention. Favorable reconsideration of the application is requested.

Respectfully submitted,  
Hedman and Costigan

  
Charles A. Muserlian #19,683  
Attorney for Applicants  
Tel. 212 302 8989

CAM:mlp  
Enclosures

**CERTIFICATION OF FACSIMILE TRANSMISSION**

I hereby certify that this paper is being facsimile transmitted to the Patent and  
Trademark Office on the date shown below.

Charles A. Muserian  
Charles A. Muserian #19,683

Charles A. Muserian  
11/09-06